

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
Eastern Division**

J&J SPORTS PRODUCTIONS, INC.,)
Plaintiff,)
v.)
ARMANDO GAMBOA, indiv. and d/b/a)
GRAND SPORTS ARENA, LLC. d/b/a)
GRAND SPORTS ARENA and GRAND)
SPORTS ARENA, LLC. d/b/a GRAND SPORTS))
ARENA,)
Defendants.)

Case No. 2013-cv-8588

**PLAINTIFF'S MOTION TO REINSTATE AND ENTER AN ORDER OF
JUDGMENT AGAINST THE DEFENDANTS**

NOW COME the Plaintiff, J&J SPORTS PRODUCTIONS, INC., and respectfully requests that this Court Reinstate this matter against Defendants, ARMANDO GAMBOA, indiv. and d/b/a GRAND SPORTS ARENA, LC. d/b/a GRAND SPORTS ARENA and GRAND SPORTS ARENA, LLC. d/b/a GRAND SPORTS ARENA, and in support thereof, states as follows:

1. That February 20, 2014, this matter was dismissed without prejudice by this Honorable Court, with leave to reinstate.

2. That a Settlement Agreement was entered into by both parties wherein which the Defendant would pay a total of \$7,000.00 to the Plaintiff. The first payment in the amount of \$2,500.00 was to be paid on or before February 28, 2014. Additionally, the second payment in the amount of \$5,000.00 was to be paid on or before March 30, 2014. See attached Exhibit A.

3. As of the filing of this motion, Defendants have failed to make both payments towards the agreed upon settlement.

5. That pursuant to the Settlement Agreement, Defendant currently owes Plaintiff a total amount of \$7,500.00 plus attorney's fees in the amount of Six Hundred and 00/100 (\$600.00). See attached Affidavit Exhibit B.

6. Additionally, pursuant to the Settlement Agreement, Defendants agreed to pay a \$3,000.00 penalty fee should they default in payment. See attached Settlement Agreement.

WHEREFORE, Plaintiff, J&J SPORTS PRODUCTIONS, INC., prays this Honorable Court enter an order to Reinstate this case against Defendants, ARMANDO GAMBOA, indiv. and d/b/a GRAND SPORTS ARENA, LC. d/b/a GRAND SPORTS ARENA and GRAND SPORTS ARENA, LLC. d/b/a GRAND SPORTS ARENA, and enter an Order for Judgment in the amount of Seven thousand Five Hundred and 00/100 (\$7,500.000) plus attorney's fees in the amount of Six Hundred and 00/100 (\$600.00) and Three Thousand and 00/100 (\$3,000.00) in penalty fees for a total Judgment in the amount of Eleven Thousand One Hundred and 00/100 (\$11,100.00) and for any additional relief for Plaintiff this Honorable Court deems just.

s/Andre Ordeanu
Andre Ordeanu

CERTIFICATE OF SERVICE

I, Andre Ordeanu, on oath state that a true and correct copy of the Notice of Filing was electronically filed with the Clerk of the Court on May 2, 2014, using the CM/ECF system which will send notification of such filing(s) to all attorneys of record and mailed a copy to the defendant via Certified and Regular US Mail. Under the penalties of perjury, I certify that the above statements set forth herein are true and correct.

s/ Andre Ordeanu
Andre Ordeanu

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